

**TASK FORCE RESPONSE TO FCC THIRD NOTICE OF PROPOSED
RULEMAKING ON ISSUES RELATED TO THE GMDSS**

GMDSS Task Force
2007
1600 North Oak Street; #427
Arlington VA 22209

8 January

In the Matter of)	
)	
Amendment of Parts 13 and 80 of the)	WT Docket No. 00-48
Commission's Rules Concerning)	
Maritime Communications)	
)	
Petition for Rule Making Filed by Globe)	RM-9499
Wireless, Inc.)	
)	
Amendment of the Commission's Rules)	PR Docket No. 92-257
Concerning Maritime Communications)	
)	
)	

The GMDSS Implementation Task Force respectfully submits these Comments in response to the Notice of Proposed Rulemaking published in the Federal Register on November 8, 2006 (71 FR 65447).

The GMDSS Task Force was chartered by the U.S. Coast Guard to supplement government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is broadbased including over 1500 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force

maintains a website at www.navcen.uscg.gov/marcomms which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings. Even though SSAS is not technically a GMDSS system, the Task Force has taken the initiative to extend its areas of interest to include other maritime radio systems.

INMARSAT Ship Earth Stations (Page 20, pp 32-33) The Task Force supports the inclusion of new mobile satellite providers in the GMDSS and therefore would support authorization under Section 80.905 of any mobile satellite equipment which, in the opinion of the Commission, meets the requirements of the GMDSS. However, the Task Force believes that action is required to amend the Commission's Rules to further encourage and accommodate approval of new satellite systems, so as to provide a straightforward and clear framework for authorization. Such a framework should include clear procedures for authorization, and should require that candidate satellite systems meet the essential requirements of the GMDSS. However, at the same time, this framework should be flexible enough to permit evolution of those international requirements.

INMARSAT-E (Page 36, pp 68). The Task Force concurs with the Commission's proposal to cease authorizing INMARSAT-E EPIRBs in view of the phase out by Inmarsat.

GPS Requirement for VHF-DSC Handhelds Equipment (Page 37, pp 69-70).

The Task Force concurs that inclusion of a GPS capability in VHF-DSC

handhelds would be highly desirable from a safety standpoint but notes that the Commission has not taken the counterpart action to require that fixed mount VHF-DSC equipment on voluntary vessels be required to be connected to a GPS receiver. The Task Force is mindful that many voluntary vessels in distress have been unable to provide an accurate position, and that many vessels already equipped with VHF-DSC equipment have failed to register for an MMSI number which renders the automated features, including position reporting, inoperative.

If the Commission decides to require an integral GPS capability on VHF-DSC handhelds used by voluntary vessels, the Task Force notes that this amounts to a new regulation specifying that all new VHF handhelds manufactured after a certain date meet DSC specifications and have integral GPS capability. The Task Force further recommends that new regulations be adopted requiring fixed mount VHF-DSC equipment on voluntary vessels be connected to a GPS receiver and that both fixed mount and handheld equipment be registered for an MMSI number to enable the automated features of DSC. The Task Force recognizes that such regulations, similar to watch requirements for voluntary vessels using VHF, are difficult to enforce but feels that they should be included in the rules in order to reach a broader audience and provide authority for the training media which seek to promulgate proper procedure among voluntary users.

Just as the Task Force has supported mandatory watch by vessels using the GMDSS system voluntarily, we feel that they should also contribute to the common safety features of the GMDSS and be required to participate in the automated features if using VHF-DSC. Should the Commission decline to require integral GPS in all VHF-DSC handhelds, the Task Force recommends that any VHF-DSC handheld radio permitted for GMDSS purposes on regulated vessels should have an integral GPS capability.

Carriage Requirements for Small Passenger Vessels (page 37, pp 71). The Task Force concurs that any regulated small passenger vessel not required to have a reserve power supply should be required to carry at least one VHF Handheld radio. Since these are regulated vessels, the handheld should be a VHF-DSC radio.

Ship Station Facsimile Frequencies/Transmission of Data on Voice Channels (Page 38, pp 72). The Task Force supports the work of the RTCM Special Committee No. 123 which was created to develop proposals for a VHF Digital Small Message Service. The Committee's Report notes that current regulations permit the transmission of data on VHF channels and that use of the Carrier Sense Time Division Multiple Access (CSTDMA) mode as recommended by IEC 62287 would not conflict with other uses of the VHF

channels. The Task Force concurs with the RTCM technical recommendations in regard to this issue.

Private Coast Station Frequencies (Page 38,pp 73). The Task Force sees no need to limit the frequencies authorized for use by private coast stations assuming that the frequencies are for shared use and not assigned exclusively to a single licensee..

Radar Standards (Page 39, pp 74). The Task Force concurs with the RTCM technical analysis regarding this issue.

Testing of GMDSS Radio Equipment (Page 40, pp 75). The Task Force concurs that vessels subject to Subpart W requirements should be required to test radiotelephone equipment on a daily basis. Further, the Task Force is aware of a detailed set of comments on this issue prepared and filed separately by Mr. Owen Anderson, Chairman of the Task Force's Training Group. The Task Force concurs with these comments and recommends their adoption to eliminate confusion in the Regulations.

For the GMDSS Task Force,

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